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**MEMORANDUM ENDORSED**

January 15, 2025

Via ECF

Hon. Gregory H. Woods,  
 United States District Judge  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

**Re: Lambert et al v. New Start Capital et al,**  
**Docket No.: 1:24-cv-8055**

Dear Judge Woods:

We represent Plaintiffs on behalf of themselves and a putative class and collective action in the above-docketed matter. In compliance with Rule 1(E) of this Court's Individual Rules of Practice, we write now to request a one week extension of the first two deadlines set forth in this Court's January 10, 2025 Order, whereby the Plaintiffs will submit their proposed Second Amended Complaint to Defendants' counsel by Monday, **January 20, 2025** (the original due date was January 13, 2025); the parties will have a meet and confer thereafter; and the parties will submit a joint letter to this Court by Friday, **January 24, 2025**, stating their positions on the filing of the proposed Second Amended Complaint (the original due date was January 17, 2025). Counsel for Defendants, Bryn Goodman, Esq., consents to this request.

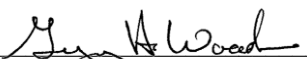
A one-week extension is necessary since one of Plaintiffs' attorneys, Jennifer Calamia, who is handling the Second Amended Complaint, has pneumonia, and will be out of the office until at least Friday, January 17, 2025.

We thank the Court for its attention to this matter.

Application granted. Plaintiffs' application for an extension of two of the deadlines set forth in the Court's January 8, 2025 order, Dkt. No. 40, is granted. The deadline for Plaintiffs to send a copy of their proposed Second Amended Complaint to counsel for Defendants is extended to January 20, 2025. The deadline for the parties to submit the joint letter described in the Court's January 8, 2025 order is extended to January 25, 2025. All other deadlines in this case remain in full force and effect. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 40.

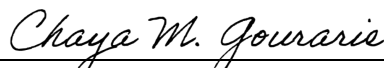
SO ORDERED.

Dated: January 15, 2025  
 New York, New York

  
 GREGORY H. WOODS  
 United States District Judge

Respectfully,

BELL LAW GROUP, PLLC

  
 Chaya M. Gourarie, Esq.